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Attorneys for Plaintiffs TechCrunch, Inc., et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TECHCRUNCH, INC. a Delaware
corporation, and CRUNCHPAD, INC., a
Delaware corporation,

Plaintiffs,

vs.

FUSION GARAGE PTE. LTD, a Singapore
company,

Defendant.

CASE NO. 09-cv-5812 RS (PVT)

**STIPULATION AND [XXXXXXXXXXXXXX]
ORDER GRANTING EXTENSION OF
TIME REGARDING FUSION GARAGE'S
PRODUCTION OF REDACTED SOURCE
CODE**

1 WHEREAS, on October 6, 2010, the Court ordered Fusion Garage to produce several
2 categories of documents including source code documents. (Dkt. 184) (hereinafter "Order"). The
3 Court allowed Fusion Garage to redact the actual JooJoo source code while leaving the source
4 code comments and metadata;

5 WHEREAS, the Court's Order established a deadline of October 22, 2010 for this
6 production;

7 WHEREAS, the responsive source code documents comprise 10,325 discrete documents
8 and 76,289 individual pages, virtually all of which require manual redactions for each page;

9 WHEREAS, Fusion Garage has been diligently redacting and processing these documents
10 for production, but will require roughly two weeks from the present date to finish this process,
11 given the volume of source code documents and the number of manual redactions at issue;

12 WHEREAS, Fusion Garage has prepared the other non-source code documents called for
13 by the Order for production and will produce these documents by October 22, 2010, and will also
14 respond to Plaintiffs' Interrogatory Nos. 1 and 2 by October 22, 2010;

15 WHEREAS, counsel for the parties have meet and conferred concerning Fusion Garage's
16 source code redactions and the need for additional time to comply with the Court's Order;

17 WHEREAS, the following time modifications have been previously made in this case:
18 time to file a responsive pleading (Dkt. No. 16); motion to set the hearing dates on Fusion
19 Garage's motion to dismiss, to strike, and for a more definite statement ("motion to dismiss") and
20 Plaintiffs' motion for a preliminary injunction to May, 6, 2010 (Dkt. No. 45); motion to shorten
21 time to hear Fusion Garage's motion to compel documents to support its opposition to Plaintiffs'
22 Motion for a preliminary injunction (Dkt. No. 55); setting new hearing date on Plaintiffs' motion
23 for a preliminary injunction and defendant's motion to dismiss (Dkt. 64); and granting extension
24 of time regarding briefing on Plaintiffs' motion to compel (Dkt. 178);

25 NOW, THEREFORE, the parties stipulate and agree that Fusion Garage shall have a two-
26 week extension, until November 5, 2010, to produce its redacted source code documents to
27 Plaintiffs. The October 22, 2010 date for Fusion Garage to produce its non-source code
28

documents and respond to Plaintiffs' Interrogatory Nos. 1 and 2 set forth in the Court's October 6, 2010 Order shall remain unchanged.

IT IS SO STIPULATED.

Dated: October 20, 2010

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Thomas R. Watson

Thomas R. Watson

Attorneys for Defendant Fusion Garage PTE., Ltd.

DATED: October 20, 2010

WINSTON & STRAWN LLP

By /s/ Matthew A. Scherb

Matthew A. Scherb

Attorneys for Plaintiffs TechCrunch, Inc. and
CrunchPad, Inc.

Pursuant to stipulation, it is SO ORDERED.

DATED: October 21, 2010



HON. PATRICIA V. TRUMBULL
UNITED STATES MAGISTRATE JUDGE

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest that I have obtained concurrence in the filing of this document from Matthew A. Scherb, counsel for Plaintiffs.

DATED: October 20, 2010

By: /s/ Thomas R. Watson
Thomas R. Watson